

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

UNIVERSITAS EDUCATION, LLC,

Petitioner/Judgment Creditor,

v.

Case No. 14-FJ-5-HE

NOVA GROUP, INC.,

and

AVON CAPITAL, LLC, a Connecticut
limited liability company,

Respondents/Judgment Debtors.

**INTERVENOR AVON CAPITAL-WYOMING'S
MOTION FOR SUMMARY JUDGMENT**

Avon Capital, LLC, a Wyoming limited liability company ("Avon Capital-WY"), by the undersigned counsel, moves for Summary Judgment pursuant to Federal Rule of Civil Procedure 56. Avon Capital-WY simultaneously files a Memorandum in Support of this Motion for Summary Judgment.

/s/ Alan L. Rupe

Alan L. Rupe, OBA No. 20440

LEWIS BRISBOIS BISGAARD & SMITH LLP

1605 N. Waterfront Parkway, Suite 150

Wichita, KS 67206

Telephone: 316-609-7900

Facsimile: 316-462-5746

*Attorney for Intervenor Avon Capital, LLC, a
Wyoming limited liability company*

CERTIFICATE OF SERVICE

I certify that on February 28, 2020, I electronically filed the above Motion for Summary Judgment, using the CM/ECF System. Based on the records on file, the Clerk of Court will transmit a Notice of Electronic Filing to the counsel of record.

/s/ Alan L. Rupe

Alan L. Rupe